IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK (MANHATTAN)

	)	In Proceedings for a Reorganization
	)	Under Chapter 11
IN RE:	)	
	)	Case No. 09-50026-reg
GENERAL MOTORS CORPORATION	)	
	)	Honorable Robert E. Gerber
Debtor	)	
	)	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

Please take notice that, pursuant to Section 1109(b) of the Bankruptcy Code and

Bankruptcy Rules 2002(j)(4), 3017(d), 9007, and 9010(b), Kelley & Ferraro, LLP, hereby enters

its appearance on behalf of all asbestos tort claimants represented by Kelley & Ferraro, LLP with

a claim against the Debtor herein. Kelley & Ferraro, LLP requests on behalf of these asbestos

tort claimants that all notices given or required to be given and all papers served or required to

be served in this case be given to and served upon the undersigned attorneys at the address and

telephone number set forth below:

Thomas M. Wilson, Esq.
Kelley & Ferraro, L.L.P.
2200 Key Tower
127 Public Square
Cleveland, Ohio 44114
(216) 575-0777
Fax: (216) 575-0799

Please take further notice that pursuant to Section 1109(b) of the Bankruptcy Code, the

foregoing request includes not only the notices and papers referred to in the Rules specified

above, but also includes, without limitations, any notices, orders, applications, motions,

petitions, pleadings, requests, complaints or demands, and any other document brought before

the Court in this case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise.

Respectfully submitted this 1st day of June 2009.

KELLEY & FERRARO, LLP

By   /s/ Thomas M. Wilson
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127 Public Square
Cleveland, Ohio 44114
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Appearance and Request for Service of Papers was electronically filed via CM/ECF and thereby served upon all counsel of record on June 1, 2009.

  Electronically Filed
Thomas M. Wilson